

CC Docket No. 94-102 – January 2004 E911 Interim Report

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Date: January 15, 2004

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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**TIER III CARRIER INTERIM REPORT
AS OF JANUARY, 2004
CC Docket No. 94-102**

Commnet of Florida, L.L.C. ("Commnet-FL") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), *Public Notice*, DA 03-2113, released June 30, 2003, and *Order to Stay*, FCC 03-241, released October 10, 2003.

Carrier Identifying Information:

Carrier Name: Commnet of Florida, L.L.C. – FRN 0005-2580-90

E911 Compliance Officer: John D. Champagne
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E911 Implementation Information:

Commnet-FL is operating as a "carriers' carrier". Thus, Commnet-FL has no subscribers and will not have any subscribers. Based on this premise, Commnet-FL hereby reports as follows:

- ☐ Commnet-FL has received one Phase I request from the PSAP for Monroe County, FL. Commnet-FL has not received any other Phase I requests nor any Phase II requests from any PSAPs in its market. Commnet-FL retained the services of Intrado, Inc., as a consultant to assist it in contacting and working with the Monroe County PSAP and any other PSAP in its markets that may request Phase I E911. Intrado is one of the most respected names in the E911 industry. Most of its personnel have over twenty years of experience working for PSAPs or in the PSAP field. Commnet-FL and Intrado have been in continuous communications with the Monroe County PSAP, in an effort to implement Phase I as expeditiously as possible.

Commnet-FL has obtained and installed all of the equipment and software necessary to meet the PSAP's Phase I request, and is currently working with BellSouth, the local exchange carrier ("LEC"), to obtain a landline connecting the PSAP to the switch in Miami, FL. Commnet-FL registered as a vendor in the state, per state requirements, and is on the agenda of the meeting of the Board of Monroe County Commissioners' scheduled for January 21, 2004. Commnet-FL will present its Phase I implementation proposal and cost model for approval at this meeting.¹ It is unclear at this time whether Monroe County has a cost recovery program; Commnet-FL is currently attempting to obtain more information in this

¹ Florida tried but was unable to get on the agenda for the Board's December 2003 meeting, due to the Board's need to address other, non-telecom matters at that meeting.

regard. Notably, Commnet-FL has no subscribers and thus has no means of self-funding the Phase I implementation fees and recurring costs via subscriber pass-throughs.

- Commnet-FL elected a handset-based solution. Commnet-FL is using analog and TDMA technology and is considering migration to GSM technology.
- Commnet-FL has installed all of the necessary switch hardware and software for Phase I E911 deployment. Commnet-FL still anticipates a significant problem with its Phase II E911 deployment. There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM, and it appears that one will not become available any time in the near future. Moreover, Commnet-FL is unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

The only portion of Commnet-FL’s market not located in the Everglades and thus off limits to cell site construction, are the Florida Keys. The Florida Keys consists of a string of very tiny and narrow islands. Because Commnet-FL’s cells are located along a string of islands, cells are necessarily constructed in a classic string-of-pearls arrangement. Accuracy of any implemented triangulation or AOA techniques would be virtually non-existent. Rather than obtaining a single point, at best Commnet-FL would be able to determine where the mobile signal is somewhere along a two-dimensional line. Although the narrowness of the Keys would enable Commnet-FL and the PSAP to plot where that line crosses land, the caller location would be identifiable only if the mobile signal was coming from somewhere on land. Commnet-FL would not be able to determine where a mobile signal was coming from if it was coming from somewhere on the water (*e.g.*, from a boat). Therefore, Commnet-FL would never reach a 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules.

- Commnet-FL obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. Commnet-FL did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. Commnet-FL added no new subscribers after October 1, 2002. As previously discussed, Commnet-FL is now operating entirely as a “carriers’ carrier”. Commnet-FL currently has no subscribers, but, rather, serves only the customers of other carriers. Commnet-FL will not have any future subscribers.
- Commnet-FL does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the permanent absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond Commnet-FL’s control. Even if Commnet-FL were to migrate to GSM technology, there is currently no GSM handset-based technology available, and vendor predictions of future development are unreliable. Commnet-FL has a request pending with the Commission for a permanent waiver of the Phase II requirements.

- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.